

The Law Office of Eugene R. Scheiman, PLLC

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August 5, 2024

The Hon. Alan S. Trust  
Chief Judge  
United States Bankruptcy Court  
Eastern District of New York  
Alphonse M. D'Amato U.S. Courthouse  
290 Federal Plaza  
Central Islip, NY 11722

Re: Case No. 8-20-08049 (AST)

Your Honor,

We represent Arvind Walia and Niknim Management, Inc. in the above noted Adversary Proceeding which was tried before the Court on July 24, 2024.

At closing argument Your Honor requested that the Defendants explain what occurred to some one million three-hundred dollars (\$1.3 million) dollars which were disbursed as funds based on the sale of Porteck Corporation to Physicians Practice Plus, LLC.

After consultation with Mr. Walia, the answer to Your Honor's inquiry appears to be found in Plaintiff's Exhibits 1 (the Asset Purchase Agreement) and 5 (Post Closing payment calculation contained in an email from Mr. Walia to Mr. Parmar and others).

Exhibit 5 shows a deduction from the purchase price of five hundred thousand dollars (\$500,000.00) to pay down an advance (loan), alleged to be by CHT to Porteck. Six hundred thousand dollars (\$600,000.00) was deducted to enable the payment of a loan assumed by CHT. Two hundred thousand dollars (\$200,000.00) was deducted for Abstract fees.

Together the listed deductions on Exhibit 5 contain a record explanation of the "missing" amounts, the

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details of which Defendant Walia was unable to recall during his cross-examination and questioning by Your Honor.

Respectfully,  
*Eugene R. Scheiman*

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